The Cross Examination of Deputy Christian Roush:

1. Deputy Roush do you have clear memory of the events that unfolded on March 29th, 2025 pertaining to my traffic stop?

2. Pertaining to my traffic stop, did you, Deputy Roush make any mistakes that evening?

3. Pertaining to my traffic stop, have you, Deputy Roush ever made any incorrect statements about this incident?

--HAND EXHIBIT 1--

4. Deputy Roush, are you aware that the Frederick County Sheriff's Office immediately released all bodycam footage of this incident to the media for free based on citizen complaints?

5. Deputy Roush, are you aware FCSO specifically stated in their release letter that the fees were being waived for "public interest, and for transparency and accountability of the agency"

meaning accountability of your stop. We're you made aware of this?

6. Deputy Roush, do you agree with the sheriff's office public position on this matter, that some things that happened during this traffic stop give rise for accountability?
7. Deputy Roush is it true that after you pulled me over, on first contact you asked me if *"I had anything to drink that night"*

8. What was my answer to that question?

9. Deputy Roush, after first contact, you walked back to your unit and stated to your fellow officer that you observed no signs of drugs or alcohol in my vehicle or on my person, correct?

10. You stated that you did not smell alcohol or drugs, correct?

11. And it is true that, you did not witness drugs or alcohol in the vehicle?

12. Yet you still sought out to perform a field sobriety test on me, is that correct?

13. Is it then true, you walked to my vehicle, asked me to step out, and perform a Field Sobriety Exercise?

14. Now Deputy Roush per your training with FCSO, isn’t it true that you are aware that field sobriety tests are voluntary?

15. And you are also aware that refusal of FST is protected by the Fifth Amendment to the United States constitution, that being the right against self-incrimination? You know that?
16. But yet, you told me that I would be arrested if I didn't consent to field sobriety tests. Is that correct?

17. Is refusing field sobriety tests a crime in Maryland?

18. And you stated on the scene of my arrest, that my refusal to perform field sobriety exercises was probable cause to arrest me, isn’t that true?

19. And you did in-fact arrest me?

20. After my arrest, my vehicle was searched by three deputies and no contraband or alcohol was found, is that correct?

21. After my arrest, Deputy Roush, you ensured that my vehicle was towed away, and also impounded, isn't that true?

22. Deputy Roush, isn't it true that as you were arresting me for DUI, I told you that I would blow a 0.00 on a medical breathalyzer machine?

23. Deputy Roush isn't it true after you placed me in the back of your unit, you walked up to (Officer Bittenmaster) at 9:55 PM, and you said the following statement on camera <u>"He's like I'm gonna blow straight zero's… OK… I don't give a fuck…"</u>

24. Now Deputy Roush isn't it true, after you said those words, you and your deputies laughed about how funny that statement was?

25. Now Deputy Roush why was the concept of arresting someone who was asserting their innocence so funny to you?

26. Now Deputy Roush, that night, you also talked about the "Maryland Implied Consent Law", didn't you?

27. Now Deputy Roush, isn't it true you tried to also use "the Maryland Implied Consent Law" to justify my arrest?

28. Isn't it true, you made the statement (quote) **"It's called Implied Consent, it's on the back of your license"**

-----PULL OUT LICENSE----

29. Now Deputy Roush were you saying that it's your belief that on the back of a Maryland Driver's license it says you can be arrested for not performing field sobriety tests?

30. Deputy Roush what part of the "Maryland Implied Consent Law" talks about Field Sobriety Exercises?

31. Isn't it true, you were mistaken that evening about your understanding of the Maryland implied consent law?

32. Deputy Roush did you transport me to Frederick County Sheriff's Office that evening?

33. And did I perform a medical breathalyzer test?

34. And what was the reading of my blood alcohol content?

35. So I was not under the influence of alcohol? Correct?

36. And then you called in a Drug Recognition Evaluator from the Maryland State Police?

37. And that drug recognition expert did not come to a finding that I was on drugs, isn't that correct?

38. And after all that Deputy Roush, you then realized you had no evidence to hold me for a crime, is that correct?

39. And that point, you released me, is that correct?

40. And when you released me, it was with no car, at midnight on Sunday, outside the sheriff's office? Isn't that correct?

41. And just before you released me isn't it true Deputy Roush, that you handed me a citation, hours after the traffic stop?

WITH THAT YOUR HONOR LETS GET DOWN TO WHY WE ARE HERE TODAY

---EXHIBIT 4----

42. Deputy Roush before I ask you anything about the citations, I would first like to confirm that you are the one who issued the citations, correct?

43. And those citations have your signature?

44. Deputy Roush at this time, I would like to ask you a very simple question, did you make any incorrect statements on my issued citations?

45. Deputy Roush isn't it true, you did not fill out these citations at the scene, but rather hours later at the sheriff's office, isn't that true?

46. Deputy Roush, what is the time that you wrote as the **violation time** on my ticket?

47. Now, Deputy Roush, isn't it true, that 11:02 PM as a matter of fact, could not have been the time I allegedly ran a red light?

48. And the time that you wrote as my violation time isn't even close to being accurate, isn't that true Deputy Roush?

---EXHIBIT 2----

49. Deputy Roush isn't it true that at 11:02 PM, the time you wrote on the citations, that I, Levi Trumbull was sitting in a holding room at the Frederick Sheriff's Office?

50. Deputy Roush isn't it true that at 11:02 PM I, Levi Trumbull was captured on body camera sitting in a holding room at the Frederick Sheriff's office?

51. So do you acknowledge that the **violation time** for both tickets is incorrect?

Moving on….

52. Now Deputy Roush what is the violation location that you wrote on both traffic citations to me?

--- EXHBIT 5 ----

53. Now Deputy Roush, is this a photograph of the light and intersection on Route 355 Urbana Pike @ Grove Road?

54. Now Deputy Roush, does that photograph depict the very same light that you allege I ran per the citation.

55. Deputy Roush isn't it true, that my vehicle pulled over and stopped at the Tate Dealership located at 5708 Urbana Pike.

--- EXHBIT 6 & 7----

56. And isn't it true that the Tate Dealership, if you are travelling northbound, is located before a motorist can reach the Grove Road Intersection. Is that a true statement?

57. Deputy Roush, could you please explain how I ran the red light at the Grove Road intersection, when my vehicle never made it to Grove Road, but instead pulled over onto the Tate dealership estate?

58. Deputy Roush, when you pulled me over do you recall me denying that I ever ran a red light?

59. Do you recall me asking you which red light I ran?

60. And do you recall saying to me **“the one at Lowes Lane”**

61. And as a matter of fact, the intersection at Lowes Lane is an entirely different intersection then the one at Grove Road. Yes?

62. Now Deputy Roush, does the filed incident report the one that you wrote, mention anything about running a light at **“Grove Road”?**

63. Deputy Roush, isn’t it true that the intersection located at Grove Road and the intersection at Lowes Lane on 355 Urbana Pike are not even close to each other?

63. Deputy, isn’t it true that my vehicle never set one tire on Grove Road on March 29th?

64. Deputy Roush isn’t it true there are clear inconsistencies between your verbal statements on scene, the issued citation, and the police report, in

terms of the time and location of the incident as to which light was allegedly ran?

NOTHING FURTHER YOUR HONOR

Closing Statement

Your Honor,

I stand before you today to address two citations issued to me on March 29, 2025: failing to obey a properly placed traffic control device and failure to display my driver's license to a police officer. I respectfully submit that both citations should be dismissed based on the evidence presented today.

#1 The Citations Are Invalid on Their Face

First and foremost, the charging documents contain fundamental errors that render them invalid. Deputy Roush cited me for running a red light at "355-Grove Road" when the alleged incident—according to his own verbal statements—occurred at "355-Lowes Lane," approximately 0.6 miles away in a different zip code. On March 29th 2025, my vehicle never set one tire on Grove Road. Furthermore, the citation states the violation time as 11:02 PM, nearly 90 minutes after the actual traffic stop which the body camera indicates at approximately 9:39 PM.

These are not minor clerical errors, Your Honor. They represent substantial inaccuracies that call into question

the reliability of the entire citations. A citation with incorrect time and location fails to properly notify me of the charges against me and prevents me from mounting an adequate defense.

The Officer's Credibility Has Been Severely Compromised

Deputy Roush's testimony today, combined with the evidence from the bodycam footage, reveals serious issues with his credibility:

1. He arrested me for DUI despite admitting to another officer that he observed no signs of drugs or alcohol.
2. He threatened me with arrest if I did not submit to field sobriety tests, which are voluntary, and protected by my Fifth Amendment rights.
3. He proceeded with a DUI arrest based solely on my constitutional exercise of rights, not on any observable evidence of impairment.
4. I blew a 0.00 on the breathalyzer and passed a drug recognition evaluation,
5. Deputy Roush was heard saying he "didn't give a f***" about what my results would be earlier in the night.
6. The Frederick County Sheriff's Office took the extraordinary step of releasing this bodycam footage free to the media specifically for "accountability of the FCSO Agency"—a clear indication that the department itself recognized the problematic nature of this incident. To my understanding media figures like Ken Buckler and Shaun Porter News are here today to report on these cases.

I Have Already Paid a Substantial Price

Your Honor, even though I was innocent of any impairment and ultimately released without DUI charges, I have already paid a heavy price for this encounter:

1. I was subjected to the humiliation of a public arrest.
2. My vehicle was impounded, costing me $367 to retrieve.
3. My reputation was jeopardized until the bodycam footage was released.

Request for Relief

Your Honor, courts exist to ensure justice and to protect citizens from improper applications of power. This case represents a clear instance where an officer's judgment was flawed and his actions exceeded lawful authority.

I respectfully request that this court dismiss both citations and make what is wrong about this situation right. The charging documents contain fatal errors, the officer's credibility has been severely compromised, and I have already paid a substantial price for an incident in which I committed no crime.

The integrity of our justice system depends on courts being willing to dismiss charges when the evidence

demands it. This is such a case as that, and I ask you to render a verdict of not guilty on both citations.

Thank you, Your Honor.